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Attorneys for Rabo AgriFinance LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

<p>IN RE:</p> <p>McCLAIN FEED YARD, INC., McCLAIN FARMS, INC. and 7M CATTLE FEEDERS, INC.,</p> <p>Debtors.¹</p>	<p>CASE NO. 23-20084-7-rlj</p> <p>(Jointly Administered Cases)</p> <p>Chapter 7</p>
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¹ The Debtors in these jointly administered Chapter 7 cases are: (a) McClain Feed Yard, Inc. (Case No. 23-20084), (b) McClain Farms, Inc. (Case No. 23-20885) and 7M Cattle Feeders, Inc. (Case No. 23-20886). All three cases are being jointly administered under the case number for McClain Feed Yard, Inc.

**RABO’S WITNESS AND EXHIBIT LIST CONCERNING HEARING ON THE
TRUSTEE’S MOTION TO COMPEL [DKT. 268]**

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

Rabo AgriFinance LLC (“**Rabo**”), through counsel, respectfully submits this Witness and Exhibit List concerning the upcoming hearing on the Trustee’s Motion to Compel Production of Documents from Rabo AgriFinance LLC and Focus Management [Dkt. 268] (the “**Motion**”):

WITNESS LIST

The following is the list of Rabo’s “will call” witnesses and “may call” witnesses for the Hearing on the Motion:

Will Call Witnesses

1. None.

May Call Witnesses

1. Michael R. Johnson.
2. Hudson Jobe.
3. Any witnesses that the Trustee or any other party identifies and/or calls as a witness.
4. Rebuttal witnesses whose identity cannot yet be ascertained.

EXHIBIT LIST

1. August 23, 2024 Objection and Opposition to the Trustee’s Motion to Compel filed by Rabo AgriFinance LLC and Focus Management Group USA, Inc., Dkt. 284.

2. September 3, 2024 Supplement to Objection and Opposition to the Trustee's Motion to Compel filed by Rabo AgriFinance LLC and Focus Management Group USA, Inc., Dkt. 289.
3. June 5, 2024 Objections and Responses to Subpoena Served on Rabo AgriFinance LLC.
4. June 5, 2024 Objections to Subpoena Served on Focus Management Group USA, Inc.
5. Engagement Letter between Ray Quinney & Nebeker P.C. and Dawson Forensic Analytics, PLLC, dated May 5, 2023 [RABO-MCCLAIN 00001-00005]
6. Agreement for Consulting Services between Ray Quinney & Nebeker P.C. and Focus Management Group USA Inc., dated March 17, 2023 [RABO-MCCLAIN 00006-000012]
7. September 6, 2024 email correspondence between counsel for Rabo and counsel for the Trustee.
8. September 3, 2024 email correspondence between counsel for Rabo and counsel for the Trustee.
9. September 3, 2024 email correspondence from counsel for Rabo to counsels for numerous parties, including the Trustee, providing link to download RABO-MCCLAIN 000007-034518.
10. August 20, 2024 email correspondence from Alan Dabdoub to Rabo's counsel confirming "we already have RAF/AT Subpoena Response 00001-2334."

11. August 16, 2024 email correspondence from counsel for Rabo to counsel for the Trustee regarding Trustee's Motion to Compel and attempt to meet and confer.
12. Any exhibit designated by the Trustee or any other party.
13. Any pleadings, reports or other documents filed in the Debtors' bankruptcy cases.
14. Any impeachment, rebuttal or demonstrative exhibits.

Rabo reserves the right to amend or supplement this Witness and Exhibit List at any time prior to the hearing on the Motion.

DATED this 9th day of September, 2024.

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/s/ Michael R. Johnson

Michael R. Johnson

Attorneys for Rabo AgriFinance LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2024, the foregoing **RABO'S WITNESS AND EXHIBIT LIST CONCERNING HEARING ON THE TRUSTEE'S MOTION TO COMPEL [DKT. 268]** was filed with the Clerk of the Court in the above-entitled case, which sent notice of electronic filing to all electronic filing users in the case.

/s/ Michael R. Johnson

Michael R. Johnson

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